

## REMARKS

The current advisory action makes no attempt to address the substance of the previous response. Instead, there is a cursory allegation that a *prima facie* case of obviousness under 35 U.S.C. § 103 has been established, that it has not been rebutted by evidence, and that arguments can't take the place of evidence. This is not a fair consideration of the previous response, as indicated by the fact that the comments in the advisory action could have been written without reading the applicants' previous response.

The *prima facie* case is in dispute. Applicants are attempting to discuss the evidence, and point to evidence in the record that is being ignored in making the current rejection. To narrow the issues for appeal, or avoid appeal altogether, applicants request that the substance of applicants' arguments and request for reconsideration be addressed.

Specifically, the examiner asserts that hot isostatic pressing is recognized as suitable for the purpose of forming a chemical bond between substrates and relies upon Cohn for this teaching. However, Cohn, only teaches that hot isostatic pressing is suitable for formation of physical bonds between metallic bonding features and target features deposited onto substrates (See Cohn, col. 8, lns. 34-40) and includes no teaching of bonding substrates with hot isostatic pressing. The examiner's agreement or disagreement with this point is solicited, as it would narrow the issues for appeal.

Further, if the examiner agrees with applicants as to Cohn's teachings, then applicants request an explanation of how Cohn's process that is suitable only for the

purpose of bonding metallic bonding features provides any suggestion to modify Bhat's method for chemically bonding semiconductor substrates.

For all of the foregoing reasons, and the reasons previously stated applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By 

Kevin T. Bastuba

Registration No. 59,905

May 29, 2009  
300 South Wacker Drive  
Suite 2500  
Chicago, Illinois 60606  
(312) 360-0080  
Customer No. 24978